

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>UNITED STATES OF AMERICA,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>Criminal No. 4:24-cr-221</b>
	§	
<b>IRADA AKHOUNDOVA,</b>	§	
	§	
<b>Defendant.</b>	§	

**DEFENDANT IRADA AKHOUNDOVA’S UNOPPOSED MOTION  
FOR MODIFICATION OF CONDITIONS OF RELEASE**

The Defendant, Irada Akhoundova, by and through undersigned counsel, respectfully moves for an Order modifying her conditions of release. In support of her Motion, the Defendant states as follows.

1. Ms. Akhoundova pled guilty to Count One of the Information on May 1, 2024. She is currently released on conditions that include travel restrictions as follows. Travel is restricted to:  
  
Harris and surrounding counties. Permission to travel to Ct. [Connecticut] to visit family and Washington D.C. to meet with lawyers on this case, all with advance notice to PTS.
2. Ms. Akhoundova respectfully requests the following modification of these conditions to clarify that she is permitted to travel to the Southern and Eastern Districts of New York in order to facilitate travel to see her family in the District of Connecticut.
3. Specifically, in order to travel from the Southern District of Texas to the District of Connecticut, Ms. Akhoundova necessarily must fly to one of two airports (La Guardia or John F. Kennedy airports) both of which are situated in the Eastern District of New

York. Upon landing at either of these airports, Ms. Akhoundova must then travel west through the Southern District of New York (which includes Manhattan, the Bronx and Westchester Counties) before driving north towards the District of Connecticut.

4. There is no practical way to reach the District of Connecticut by car from the New York City airports other than by first travelling through the Eastern and Southern Districts of New York.
5. Accordingly, for the avoidance of doubt, Ms. Akhoundova requests that her travel conditions be modified to make clear that her previously authorized travel to Connecticut to see her family (with advance notice to PTS), necessarily includes travel to and through the Eastern and Southern Districts of New York.
6. The Government has been briefed about this proposed travel modification, and does not oppose this request.
7. Ms. Akhoundova's Pre-Trial Services Officer has also been briefed about this proposed modification, and has no objection to this request.

Accordingly, Ms. Akhoundova respectfully requests the Court order that Ms. Akhoundova's conditions of release be modified to permit her travel from the Southern District of Texas to the District of Connecticut and points in between, including the Eastern and Southern Districts of New York.

Pursuant to LR5.2 and CrLR49, Ms. Akhoundova respectfully advises the Court that this case is related to *United States v. Cuellar, et al.*, No. 4:24-cr-224 (SDTX).

Respectfully submitted,

/s/ Lisa Krigsten

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### **Certificate of Service**

I hereby certify that on November 21, 2024, I caused to have electronically filed the foregoing with the Clerk of Court for the Southern District of Texas using the CM/ECF System, which will send notification of such filing to all parties or counsel of record.

/s/ Lisa Krigsten

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**Certificate of Conference**

I hereby certify that on October 15, 2024, counsel for the United States was contacted to obtain the Government's position on this motion. Counsel for the Government stated that the Government does not oppose Ms. Akhoundova's motion.

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